

EXHIBIT A

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Attorneys for Defendants State of Arizona,
Michael R. Sheldon, Aaron Bowen,
Lea'cher Carter, and Unique Coleman

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Matthew Phillip Solan,
Plaintiff,

vs.

The State of Arizona; Jennifer L.
Cunico; Michael R. Sheldon; Aaron
Bowen, Calvin J. Flowers; Steven Kwoh;
Kindra Ochoa, Lea'cher Carter, Unique
Coleman; John Does 1-100; Jane Does 1-
100; Black Corporations 1-10; and White
Entities 1-10,

Defendants.

Case No: CV24-02061-JJT-DMF

**CERTIFICATE OF CONFERRAL
PURSUANT TO THE COURT'S
FEBRUARY 27, 2025, ORDER (DOC. 14)
AND LRCiv 12.1(c)**

Pursuant to the Court's February 27, 2025, Order (doc. 14) and LRCiv 12.1(c), undersigned counsel for Defendants State of Arizona, Michael R. Sheldon, Aaron Bowen, Lea'Cher Carter, and Unique Coleman hereby certifies that, on March 6, 2025, she and her colleague Assistant Attorney General Jordan Kendall telephonically met and conferred with Plaintiff Matthew Solan about the deficiencies that they perceive in the operative First Amended Complaint (doc. 6). Pursuant to the Court's Order, Defendants'

1 counsel also discussed with Mr. Solan the deficiencies that they perceive in his proposed
2 Second Amended Complaint (docs. 9-10). These discussions were lengthy
3 (approximately 90 minutes long) and substantive, but the Parties were unable to agree
4 that permissible amendments can cure the deficiencies that Defendants' counsel perceive
5 in Mr. Solan's pleadings and proposed amended pleadings. Accordingly, as the Court
6 has allowed, Defendants today are resubmitting their Motion to Dismiss Counts One,
7 Four, Eleven, and Twelve of the First Amended Complaint. (Doc. 14 at 3.)

8 Respectfully submitted this 13th day of March, 2025.

9 Arizona Attorney General's Office

10 /s/ Ann Hobart

11 Ann Hobart
12 Jordan Kendall
13 Assistant Attorneys General
Attorneys for Defendants

14 I certify that I electronically transmitted
15 the attached document to the Clerk's Office
16 using the CM/ECF System for filing this
17 13th day of March, 2025.

18 COPY mailed and emailed
19 this 13th day of March, 2025, to:

20 Matthew P. Solan
21 c/o Arizona State Hospital
22 501 N. 24th Street
23 Phoenix, Arizona 85008-6056
24 legal@fox-ranch.com
25 Plaintiff

26 COPY of the foregoing mailed
27 this 13th day of March, 2025, to:

28 The Honorable Deborah M. Fine
U.S. District Court, Suite 321
401 W. Washington Street, SPC 15
Phoenix, AZ 85003-2120

/s/ Deb Sawyer